

KRISS & FEUERSTEIN LLP

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Attorneys for Felix Street Holdings LLC

Hearing Date and Time: To be determined

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

HYACINTH SIMMS,

Debtor.

-----X

Chapter 13

Case No. 1-15-42960-nhl

Hon. Nancy H. Lord

United States Bankruptcy Judge

**NOTICE OF MOTION FOR IMMEDIATE AND
PROSPECTIVE RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE, that upon the annexed Application of Felix Street Holdings LLC (the “Secured Creditor”), by its counsel, Kriss & Feuerstein LLP, the Secured Creditor will move this court before the Honorable Nancy H. Lord, United States Bankruptcy Judge at the United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East, Courtroom 2579, Brooklyn, New York 11201 on **a date and time to be determined by the Court**, or as soon thereafter as counsel can be heard, for the entry of an Order granting immediate and prospective relief from the automatic stay for cause pursuant to 11 U.S.C. §§ 362(d)(1) and 362(d)(4), such that any and all future filings under the Bankruptcy Code shall not operate as a stay as to the Secured Creditor’s enforcement of its rights in and to the real property located at (i) 1478 Flatbush Avenue, Brooklyn, New York (Block 5249; Lot 68), and (ii) 36 St. Felix Street, Brooklyn New York (Block 2096; Lot 47) and (iii) 38 St. Felix Street, Brooklyn, New York (Block 2096; Lot 48) (collectively, the “Properties”), waiving the fourteen (14) day stay imposed by FED. R. BANKR.P. 4001(a)(3), and for such further

and different relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the instant application must be made in writing and received in the Bankruptcy Clerk's Office, United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East, Brooklyn, NY 11201 and by the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York, New York 10017, no later than *seven (7) days* prior to the hearing date set forth herein.

Dated: New York, New York
September 12, 2015

KRISS & FEUERSTEIN LLP
Attorneys for Felix Street Holdings LLC

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To:

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Trustee
Standing Chapter 13 Trustee
115 Eileen Way, Suite 105
Syosset, NY 11791

Office of the United States Trustee
Eastern District of NY (Brooklyn Office)
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014

Chase Bank
P.O. Box 78420
Phoenix, AZ 85062

HSBC Bank
P.O. Box 9
Buffalo, NY 14220

NYC Water Board
P.O. Box 11863
Newark, NJ 07101

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101

New York City Water Board
Department of Environmental Protection
59-17 Junction Blvd., 13th Floor
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Attn: Andrew Rettig, Assistant Counsel 0